

From: [Joy Vartanian](#)
To: [Yamazaki, Shingo \(ECY\)](#)
Subject: WestRock Tacoma Steam Limit Project
Date: Wednesday, December 19, 2018 8:55:39 AM

Shingo Yamazaki,

Thank you for the opportunity to review and comment on the Tacoma WestRock Steam Limit Project Notice of Construction.

I am a Pierce County resident concerned about climate change and our contributions to global warming. Part of what makes Tacoma so special is its story of moving from a legacy of pollution to a community that can take pride in its industry and environment. I don't think this is a project Tacoma's industry should be proud of.

The project documents use outdated science. The NOC should use the latest IPCC numbers when determining the global warming potential of greenhouse gases. It should also use the 20-year GWP instead of the 100-year GWP since this project will have climate change impacts from the start. Please update the greenhouse gas emission calculations using the 20-year GWP from the 2013 IPCC report.

The project documents also show that no upstream emissions from natural gas were reviewed. Methane gas leaks everywhere along the way from extraction to the refinery. Please update the greenhouse gas emissions calculations to include a leakage rate.

Additionally, the NOC shows that this increase in emissions did not trigger any further review in the State code. This is unacceptable. Cumulative emissions - not just these step-by-step increases by themselves - need to be reviewed against public and environmental health codes. Please make reviewing cumulative air emissions a priority in Ecology's rulemaking.

I am glad to see that Ecology is requiring some GHG mitigation for this project. However, I want Ecology to require mitigation of ALL the new GHG emissions from this project. WestRock is taking advantage of the clean energy market by increasing their use of methane gas so they can sell more renewable energy credits. We are living in a time when we need to make big changes, now, to avoid the worst impacts from climate change – this includes industry. It is Ecology's responsibility to protect the land, air and water for Washington's future generations. Allowing any increase in GHG emissions won't do that.

Thank you for considering my comments.

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